

EXHIBIT 14

To: 'munderwood@bwbsb.com'[munderwood@bwbsb.com]
From: Richard Dearly
Sent: Case 1:16-cr-00371-RA Document 402-14 Filed 04/11/18 Page 2 of 4
Sent: Fri 12/18/2015 10:01:45 PM
Subject: Client Letter
[LTR to AAM Clients re - SEC Complaint.pdf](#)

Mac:

I hope that this note finds you well and in good spirits this holiday season. Carolyn Lisa and I tried to reach you today via telephone to update you on an important issue regarding events that took place this week regarding the SEC and Atlantic Asset Management. We are sending you the attached letter explaining what has occurred as the announcement in the press was not only factually incorrect but also extremely misleading regarding our firm.

We would like to speak with you as soon as possible next week to discuss this issue, to provide additional clarity and to answer any questions that you may have. I can assure you that Atlantic Asset Management is not guilty of any misconduct. Please let me know your availability so that we may connect via telephone. In addition, I will also reach out to Matthew at Renasant as well.

Please know how much we value our relationship with you and BWW and thank you for your continued support. I look forward to speaking with you next week and until then, may God richly bless you and the family this holiday season and throughout the new year.

My very best regards,

Richard T. Dearly
President
Atlantic Asset Management
(formerly Hughes Capital Management)
Office: (703) 684-7222
Cell: (919) 623-8672



The information in this email, and any attachments, is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email, and any attachments, by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you have received this email in error please notify us immediately (by telephone or return email) and destroy the message and all copies in your possession.

**GOVERNMENT
EXHIBIT
2658**
16 Cr. 371 (RA)



December 17, 2015

Re: SEC News Release and Complaint Filing

To Our Clients:

We want to make you aware that the U.S. Securities and Exchange Commission (SEC) filed a complaint against Atlantic Asset Management (AAM) on Tuesday, December 15th, citing securities violations. The purpose of this letter is to assure our clients that this complaint is not as it seems, and that our firm is not guilty of securities fraud, or knowingly committing any other securities violations.

GMT-Duncan, the holding company owned by us, was organized with the intention of acquiring an investment management firm that would engage in socially responsible investments along with other types of products. Financial backing was offered to us by certain individuals who organized a company called BFG Social Responsible Investing (BFG). In retrospect, we think that the partners chose the name to further induce us to permit them to back our company. Their pitch indicated a philosophy that was in line with our intentions.

These individuals, as well as entities they controlled and their affiliates took advantage of our good intentions and by deceit, fraud and manipulation, used our company for their own illicit purposes, misleading us and our employees, and wrongfully tarnishing our reputations in the investment community.

When we became suspicious of their activities eight months ago, we contacted the SEC and requested the government to investigate our concerns. Subsequent to that, we learned that other Federal authorities were investigating some of these individuals in a scheme that resulted in Federal indictments less than two months ago for matters unrelated to our firm.

In an effort to protect our firm, in October, we requested that the SEC put a monitor in place. We anticipated that this would deter any actions that BFG, its owners, officers and directors and their affiliates might take to try to acquire the assets of AAM. The monitoring would also establish the fact that we were not involved in any wrongdoings.

The regulatory action taken on Tuesday by the SEC, while unfortunately but necessarily involving our firm, is a means to fulfill our request for monitoring and to expose the wrongful acts of those disingenuous individuals.

ATLANTIC ASSET MANAGEMENT, LLC
916 PRINCE STREET ALEXANDRIA, VA 22314 P: 703-684-7222
www.AtlanticAsset.com

December 17, 2015

To Our Clients

Page 2

We want you to know that we value the relationships that we have with our clients and would never knowingly put them or their entrusted funds at unreasonable risk. Our actions have been designed to protect our clients, first and foremost, as well as our employees and the firm.

Sincerely,



Michelle Morton
Chief Executive Officer



Richard Deary
President

ATLANTIC ASSET MANAGEMENT, LLC.
916 PRINCE STREET ALEXANDRIA, VA 22314 P: 703-684-7222
WWW.ATLANTICASSET.COM